

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKIN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION

GRANT E. SNEDDON,

Plaintiff(s),

-Against-

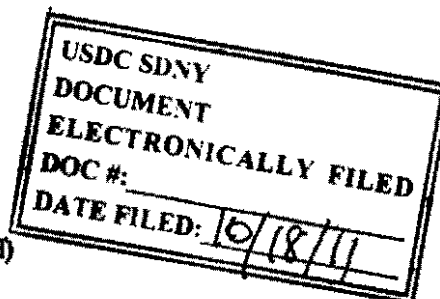
CITY OF NEW YORK, et al.,

Defendant(s),

21 MC 100 (AKH)

STIPULATION OF
VOLUNTARY DISMISSAL

Civil Action No.: 07CV09189



IT IS HEREBY STIPULATED AND AGREED, by and between the parties that, pursuant to the Federal Rule of Civil Procedure 41(a)(1)(A)(i):

- having been settled,*
1. The above-captioned Plaintiff's action is voluntarily dismissed with prejudice pursuant to the following terms and conditions: *1A*
 2. All claims by the above-captioned Plaintiff against all Defendant(s) or against any Defendant arising out of or relating in any way to World Trade Center-related rescue, recovery, and/or debris-removal operations and/or clean up at any location on and/or after September 11, 2001, are voluntarily dismissed with prejudice.
 3. All claims that were asserted or could have been brought in relation to Plaintiff's existing pleadings are dismissed with prejudice.
 4. This dismissal is without prejudice solely in relation to a second injury to the extent permitted by New York State law and as may be defined by any court having jurisdiction over any such later-filed complaint. If after this Stipulation is filed Plaintiff commences an action asserting such alleged second injury claims against any or all of the entities listed on Exhibit A to the World Trade Center Litigation Settlement Process Agreement, As Amended ("Amended SPA"), such action shall constitute a "New Debris Removal Claim" as defined in the Amended SPA.
 5. The dismissal is without costs.

A handwritten signature "AKH" enclosed in a hand-drawn circle.

PATTON BOGGS LLP

By: *James Tyrrell*
James Tyrrell (JT-4676)
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600
Attorney for WTC Captive Insureds

Dated: October 4, 2011

SCHIFF HARDIN LLP

By: _____
Paul Scrudato (PS-5927)
666 Fifth Avenue, 17th Floor
New York, NY 10103
(212) 753-5000
Attorney for Port Authority of New York &
New Jersey

Dated: October __, 2011

LITCHFIELD CAVO LLP

By: _____
James Regan (8289)
420 Lexington Avenue, Suite 2104
New York, NY 10170
(212) 434-0100
Attorney for Seasons Industrial Contracting

Dated: October __, 2011

**WORBY GRONER EDELMAN & NAPOLI
BERN**

By: *Christopher R. LoPalo*
Christopher R. LoPalo (CL 6466)
350 Fifth Avenue, Suite 7413
New York, New York 10118
(212) 267-3700
Attorney for Plaintiff

Dated: October 4, 2011

MORRISON MAHONEY LLP

By: *Gary W. Harvey*
Gary W. Harvey
250 Summer Street
Boston, MA 02210-1181
(212) 428-2498
Attorney for Survivor

Dated: October 4, 2011

So ordered
10/17/11
[Signature]

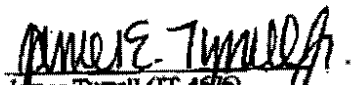
By: James Tyrrell
James Tyrrell (JT-4676)
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600
Attorney for WTC Captive Insureds

LITCHFIELD CAVO, LP

Dated: October 4, 2011


Dated: October __, 2011

PATTON BOGGS LLP

By: 
James Tyrrell (JT-4676)
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600
Attorney for WTC Captive Insureds

Dated: October 4, 2011

SCHIFF HARDIN LLP

By: 
Paul Scudato (PS-5927)
666 Fifth Avenue, 17th Floor
New York, NY 10103
(212) 753-5000
Attorney for Port Authority of New York & New Jersey


Dated: October 3, 2011

LITCHFIELD CAVO LLP

By: James Regan (8289)
420 Lexington Avenue, Suite 2104
New York, NY 10170
(212) 434-0100
Attorney for Seasons Industrial Contracting

Dated: October __, 2011

**WORBY GRONER EDELMAN & NAPOLI
BERN**

By: 
Christopher R. LoPalo (CL 6466)
350 Fifth Avenue, Suite 7413
New York, New York 10118
(212) 267-3700
Attorney for Plaintiff

Dated: October 4, 2011

MORRISON MAHONEY LLP

By: Gary W. Harvey
250 Summer Street
Boston, MA 02210-1181
(212) 428-2498
Attorney for Survivors

Dated: October __, 2011